

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) No. 09-03025-01-CR-SW-RED
)
)
SHIRLEY ANN SCHEETS,)
)
)
Defendant.)**

STIPULATION

The United States of America, by and through Beth Phillips, United States Attorney, and Robyn L. McKee, Assistant United States Attorney, both for the Western District of Missouri, and the defendant, Shirley Ann Scheets, by and through her attorney, Scott T. McBride, do hereby agree and stipulate as follows:

1. The readily provable loss amount attributable to the defendant for sentencing and restitution purposes is \$124,795.55, calculated as follows:

\$31,119.11	CD's Cashed by Defendant Without Authorization
\$25,407.66	Credit Card Collection Payments Made by Defendant from Dr. Schuster's Business Accounts for Charges incurred by Defendant Without Authorization
\$43,213.00	Funds Taken From Dr. Schuster's Social Security Checks Without Authorization
+ <u>\$25,055.78</u>	Additional Checks Drawn on Victim's Accounts Without Authorization
\$124,795.55	TOTAL

2. The stipulated loss amount calls for a 10-level increase to the defendant's base offense level pursuant to U.S.S.G. §2B1.1(b)(1)(F), for an adjusted offense level of 17 before Chapter 3 adjustments

3. Defendant continues to reserve the right to challenge the assessment of a role in the offense enhancement against her at sentencing.

4. Defendant hereby admits, stipulates and agrees that she concealed from Dr. Schuster the fact that she did not file income tax returns or pay Dr. Schuster's income or personal property taxes from approximately 1997 to 2007. Instead, the defendant affirmatively represented to her father that his tax returns and income and personal property taxes were being filed and paid in a timely manner. The defendant also shielded Dr. Schuster from learning the true nature and amount of his accumulated tax liability.

Respectfully submitted,

Beth Phillips
United States Attorney

By

Dated: June 23, 2010

/s/ Robyn L. McKee
Robyn L. McKee
Assistant United States Attorney
MO Bar No. 42971
901 St. Louis Street, Suite 500
Springfield, Missouri 65806
(417) 831-4406 telephone
(417) 831-0078 facsimile

Dated: June 23, 2010

/s/ Scott T. McBride
Scott T. McBride
Attorney for defendant Scheets
P.O. Box 248
Rolla, MO 65402-0248

Dated: June 23, 2010

Shirley Ann Scheets
Shirley Ann Scheets
Defendant